

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

EQUAN YUNUS,

Plaintiff,

-against-

ANDREW CUOMO, Governor of the State of New York, and ANTHONY J. ANNUCCI, Acting Commissioner of the New York State Department of Corrections and Community Supervision, in their official capacities; JOAN LEWIS-ROBINSON, Parole Officer, DEREK JONES, Bureau Chief, RODNEY YOUNG, Regional Director, RODNEY SMITH, Senior Parole Officer, DENISE GRANNUM, Senior Parole Officer, and YOLANDA VAZQUEZ, Parole Officer—in their individual and official capacities,

Defendants.

No. 17-CV-5839 (AJN)(BCM)

**NOTICE OF MOTION**

PLEASE TAKE NOTICE that, upon the accompanying memorandum of law and Declaration of Equan Yunus, with all exhibits annexed thereto, the undersigned will move this Court, before the Honorable Alison J. Nathan, in United States District Court for the Southern District of New York, at a date and time to be determined by the Court, for an Order pursuant to Federal Rule of Civil Procedure 65 requiring Defendants to: (1) relieve Plaintiff of his sex offender designation; (2) remove the vague residency restrictions Plaintiff is currently subject to and allow him to move in with his fiancée at 2068 Daily Avenue, Bronx, New York 10460; (3) relieve Plaintiff of restrictions on his cell phone and computer use; (4) allow Plaintiff to visit and be in contact with minor family members; (5) relieve Plaintiff of his obligation to inform any person with whom he enters into a “relationship” of his status as a sex offender; (6) relieve

Plaintiff of or tailori his ban on driving or riding in a private vehicle; and (7) provide such other relief as may be deemed just and proper.

EMERY CELLI BRINCKERHOFF  
& ABADY LLP

By: \_\_\_\_\_/s/\_\_\_\_\_  
Andrew G. Celli  
David Berman  
600 Fifth Avenue  
New York, New York 10020  
(212) 763-5000

*Attorneys for Plaintiff Equan Yunus*